

## Two methods are shown below for Temp MDL and AWL calcs:

### Temperature Analysis (95<sup>th</sup> Percentile):

Using five years of data to calculate the lognormal performance-based limits resulted in max daily limits (MDLs) of 48.5 C and 31.8 C for Outfall 001 and the Abatement Pond, respectively. The unreasonably high limits are the result of a high CV, where the seasonal variability in temperature transposes a probable range for each sample collected. For this reason EPA used the 95<sup>th</sup> percentile value of the daily max and weekly average temperature to set the MDL and AWL.

#### Performance Data for Outfall 001:

MDL = **16** (95<sup>th</sup> Percentile of Daily Max)

AWL = **15** (95<sup>th</sup> Percentile of Weekly Avg)

#### Performance Data for the Abatement Pond:

MDL = **17** (95<sup>th</sup> Percentile of Daily Max)

AWL = **16** (95<sup>th</sup> Percentile of Weekly Avg)

### Temperature Analysis (Lognormal Performance Data):

Using five years of data to calculate the lognormal performance-based limits resulted in max daily limits (MDLs) of 48.5 C and 31.8 C for Outfall 001 and the Abatement Pond, respectively. The unreasonably high limits are the result of a high CV, where the seasonal variability in temperature transposes a probable range for each sample collected. This is not reflective of the data distribution, where the temperature in summer remains relatively high, and vice versa for winter. To reflect a more representative CV, EPA used temperature collected during the critically warm season between June and September. This collected data was used to generate a more representative CV, and to set maximum daily and average weekly limits for the facility.

#### Seasonal Performance Data for Outfall 001:

MDL = **22**

AWL = **21** (Calculated using default multiplier of 1.5 from AML)

#### Using 2010-2015 data based on mean daily from June-Sept

INPUT	
LogNormal Transformed Mean:	2.5579
LogNormal Transformed Variance:	0.0490
Number of Samples per month for compliance monitoring:	20
Autocorrelation factor ( $n_0$ ) (use 0 if unknown):	0
OUTPUT	
E(X) =	13.2292
V(X) =	8.790
VARn	0.0025
MEANn=	2.5812
VAR(Xn)=	0.440
Maximum Daily Effluent Limit:	21.6
Average Monthly Effluent Limit:	14.3

Performance Data for IC-11: Outfall 001

2010-2015 data based on mean daily from June-Sept		Maximum Daily Effluent Limit:		21.6	
<b>Seasonal Data Statistics</b>		Average Monthly Effluent Limit:		14.3	
Count	594				
Average	12				
95%	15.8	AML	x	Multiplier	= AWL
std dev	2.7	14.3	x	1.15	16
CV	0.22				
		AML	x	Multiplier	= AWL
		14.3	x	1.50	21
		Using default Multiplier of 1.5			

Ref: LVNFH Temp Analysis\_ag.xlsx (Sheet Perform. Limit IC-11)

Seasonal Performance Data for the Abatement Pond:

MDL = 20

AWL = 21 (Calculated using default multiplier of 1.5 from AML)

Using 2010-2015 data based on average daily from June-Sept

INPUT	
LogNormal Transformed Mean:	2.5225
LogNormal Transformed Variance:	0.0445
Number of Samples per month for compliance monitoring:	20
Autocorrelation factor (n <sub>e</sub> ) (use 0 if unknown):	0
OUTPUT	
E(X) =	12.7393
V(X) =	7.378
VARn	0.0023
MEANn=	2.5436
VAR(Xn)=	0.369
Maximum Daily Effluent Limit:	20.3
Average Monthly Effluent Limit:	13.7

Performance Data for IC-23: Abatement Pond

2010-2015 data based on mean daily from June-Sept		Maximum Daily Effluent Limit:		20.3	
<b>Seasonal Data Statistics</b>		Average Monthly Effluent Limit:		13.7	
Count	542				
Average	3				
95%	2.8	AML	x	Multiplier	= AWL
std dev	0.2	13.7	x	1.05	14
CV	0.08				
		AML	x	Multiplier	= AWL
		13.7	x	1.50	21
		Using default Multiplier of 1.5			

Ref: LVNFH Temp Analysis\_ag.xlsx (Sheet Perform. Limit IC-23)

## Percentile method for Phosphorus MDL and AML:

Using data collected between 2006 and 2011, the lognormal performance-based analysis resulted in max daily limits (MDLs) of 63 µg/L and 275 µg/L Total Phosphorus for Outfall 001 and the Abatement Pond, respectively. With consideration to the phosphorus TMDL of 5.7 µg/L, EPA compared the lognormal performance limits with the 95<sup>th</sup> percentile values for samples collected at each outfall. EPA determined that lognormal performance levels are not protective enough of water quality in Icicle

Creek. The 95<sup>th</sup> percentile values for samples collected at Outfall 001 and the Abatement Pond were used to determine the MDLs and AMLs for the facility.

Outfall 001 Total P 95th Percentile:

MDL = **15** (Calculated using 95<sup>th</sup> Percentile of all samples)

AML = **10** (Calculated using default multiplier of 1.5 from AML)

Outfall 001 Total P Lognormal Performance-based:

MDL = **63**

AML = **42**

INPUT	
LogNormal Transformed Mean:	1.3032
LogNormal Transformed Variance:	1.4970
Number of Samples per month for compliance monitoring:	4
Autocorrelation factor ( $n_e$ ) (use 0 if unknown):	0
OUTPUT	
E(X) =	7.7811
V(X) =	210.001
VARn	0.6244
MEANn=	1.7395
VAR(Xn)=	52.500
Maximum Daily Effluent Limit:	63.4
Average Monthly Effluent Limit:	20.9
20.89182804 19.70028	

Ref: LVNFH Phos Analysis\_ag.xlsx

Abatement Pond Total P 95th Percentile (2006-2011):

MDL = **94** (Calculated using 95<sup>th</sup> Percentile of all samples)

AML = **105** (Calculated using default multiplier of 1.5 from AML)

Abatement Pond Total P Lognormal Performance-based:

MDL = **275**

AML = **105**

INPUT	
LogNormal Transformed Mean:	3.5242
LogNormal Transformed Variance:	0.8102
Number of Samples per month for compliance monitoring:	4
Autocorrelation factor ( $n_e$ ) (use 0 if unknown):	0
OUTPUT	
E(X) =	50.8686
V(X) =	3229.995
VARn	0.2716
MEANn=	3.7934
VAR(Xn)=	807.499
Maximum Daily Effluent Limit:	275.3
Average Monthly Effluent Limit:	104.7
104.6626477 97.61375	

Ref: LVNFH Phos Analysis\_ag.xlsx